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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA

Case No. 3:20-cr-00501-SI

Plaintiff,

**UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

v.

TY JOHN FOX,

Defendant

The defendant, Ty John Fox, through counsel, Alison M. Clark, respectfully moves this Court for an order continuing the trial date in the above-entitled case for 60 days. Trial is currently scheduled for March 30, 2021. The government, through Assistant U.S. Attorney Thomas Ratcliffe, has no opposition to the motion.

Mr. Fox understands that this motion will result in excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Mr. Fox does not object to the continuance and requests the granting of the motion.

The delay will be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), because additional time is needed to complete investigation, research possible defenses, research and file appropriate legal motions, and otherwise prepare for trial. The ends of justice are better served by the granting of the continuance and outweigh the best interests of the public and the defendant in a speedier trial.

Respectfully submitted on the 17th day of March 2021.

/s/ Alison M. Clark

Alison M. Clark
Assistant Federal Public Defender